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June 24, 2019

Via Email

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Auction of Toll Free Numbers in the 833 Code; Toll Free Assignment Modernization; and Toll Free Service Access Codes
Ex Parte, OEA Docket No. 19-101; WC Docket No. 17-192; CC Docket No. 95-155

Dear Ms. Dortch:

The Alliance for Telecommunications Industry Solutions (ATIS) has further input regarding the May 10, 2019, *Public Notice* seeking comment on the auction of toll free numbers in the 833 code. This input, from ATIS SMS/800 Number Administration Committee (SNAC)¹, supports excluding toll free numbers that were obtained for free from the secondary market and recommends that a unique RespOrg ID be assigned to toll free numbers that are eligible for resale.

ATIS SNAC supports the comments made by CenturyLink that numbers that do not require competitive bidding to be allocated should not be eligible for the secondary market and the exemption on brokering, hoarding, and warehousing.² ATIS agrees and notes that ATIS SNAC similarly proposed that the Commission consider rules to exclude toll free numbers that were obtained for free from the secondary market.³ As CenturyLink notes, such rules would demonstrate that there is continued competitive interest in the numbering resource at issue, rather than a fleeting interest.⁴

ATIS SNAC has further considered the operational impacts of the proposed auction. In particular, SNAC believes that there will be an ongoing need to identify numbers that are available for sale or transfer on the secondary market. ATIS SNAC therefore recommends that a unique RespOrg ID (one that has not previously been in use) be assigned to toll free numbers that are eligible for resale. This would be similar to the XXX99 RespOrg ID code that is used to identify toll free numbers warranting extra care in the verification of the Subscriber identity before a RespOrg change is made (shared services, bundled services, prior fraudulent RespOrg change attempt(s),

¹ This *ex parte* reflects the consensus of SNAC members, which includes service providers, RespOrgs, and other key stakeholders. Somos, Inc., a SNAC member, participated in the discussions surrounding the *Public Notice* but did not provide input regarding these reply comments. ATIS SNAC's advocacy on this issue does not necessarily represent the views of Somos, Inc.

² Comments of CenturyLink, Inc. at p.3.

³ Comments of ATIS at p. 2.

⁴ Comments of CenturyLink, Inc. at p.3.

government directives/court orders, internal numbers, vanity numbers, etc.).⁵ If the Commission agrees that a new code should be established, ATIS SNAC would work to modify the industry guidelines to reflect this new code and its use.

If you have any questions about this matter, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode". The signature is fluid and cursive, with a large initial "T" and a long, sweeping underline.

Thomas Goode
ATIS General Counsel

⁵ *Industry Guidelines for Toll-Free Number Administration* (ATIS-0417001-003), Section 3.2.6. This document is available from the ATIS document repository at <https://www.techstreet.com/atis/standards/atis-0417001-003?product_id=1950493>.